

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

STEPHANIE BRYANT

PLAINTIFF

vs.

CASE NO: 3:16-cv-32-CWR-FKB

FRED'S STORES OF TENNESSEE,
INC.

DEFENDANT

DECLARATION OF CHRISTOPHER W. ESPY

I, CHRISTOPHER W. ESPY, declare under 28 U.S.C. § 1746 as follows:

1. My name is Christopher W. Espy. I am over the age of 18. I make this declaration based on personal knowledge and am competent to testify about the matters set forth in this declaration.

2. I am employed with the law firm of Morgan & Morgan, PLLC in Jackson, Mississippi and work in the firm's Employee Rights Group.

3. I am Plaintiff's counsel in the matter of *Stephanie Bryant v. Fred's Stores of Tennessee, Inc.* (Case No. 3:16-cv-32-CWR-FKB).

Counsel's Background and Experience

4. I earned my undergraduate degree from Tougaloo College (Jackson, Mississippi) in 2001 where I majored in Political Science with an emphasis in International Relations. Upon graduation, I served as a Legislative Assistant to the Congressman Bennie G. Thompson, U.S. Representative for Mississippi's Second Congressional District in Washington, D.C. where I worked primarily on agricultural and rural development issues. After working on Capitol Hill, I started law school in 2003 and earned my J.D. from Howard

EXHIBIT "A"

University School of Law in 2006. While attending law school, I also worked as a Legal Clerk for the U.S. House Select Committee on Homeland Security.

5. I was admitted to the bars of the State of Mississippi in 2007 and the District of Columbia in 2009. Additionally, I am admitted to the bars of the Fifth Circuit Court of Appeals, the Northern and Southern Districts of Mississippi, the Eastern and Western Districts of Arkansas and the Western District Tennessee. I am a member in good standing of each of these bars. I have also been admitted *pro hac vice* to handle cases in the Federal Courts for the Eastern District of Louisiana, the Middle District of Alabama and the Southern District of Alabama.

6. I have been practicing law since January 2007. I began my legal career as an associate with Butler, Snow, O'Mara, Stevens and Cannada, PLLC. I practiced in the areas of general litigation, administrative law, public finance and governmental relations. In 2011, I opened my own law practice and handled a variety of civil cases with a focus on employment related matters. During that period I frequently worked with the firm of Morgan & Morgan, P.A. on a contract basis and I eventually joined the firm on a full time basis in 2014.

7. I've handled close to 200 Fair Labor Standards Act ("FLSA") single Plaintiff and collective cases that resolved in various stages (i.e. pre-lawsuit and/or lawsuit) and have handled a variety of other employment related matters. I also have experience handling FLSA collective actions. See, e.g., *Palmer v. Priority Healthcare, Inc. et al.*, Case 2:13-cv-0480-TSL-JMR (action filed on behalf of misclassified nurses); *Moore v. Poole's Cable Services, Inc.*, Case 3:13-CV-479-WHB-RHW, D.E. 60 (granting certification to class of misclassified cable installation workers); *Brown, et al. v. Phenix Transportation, et. al.*, Case

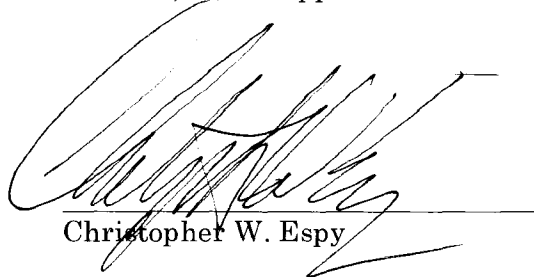
3:13-cv-781-WHB-RHW, D.E. 60 (granting certification to class of truck drivers who allege not having been paid the minimum wage); *Clinco, et al. v. Ramelli Group LLC et al.* Case 3:14-cv-00959-CWR-FKB, D.E. 89 (order approving certification of class of garbage truck drivers and hoppers who only received a flat day rate for all hours worked, including overtime hours, in a given workweek), *Santinac v. Worldwide Labor Support of Illinois, Inc.*, 107 F. Supp. 3d 610 (S.D. Miss. 2015) (nationwide class of tradesmen alleging miscalculation of their overtime); *Fairley v. Knights Marine and Industrial Services, Inc.*, Case 1:15-cv-00047-LG-RHW, D.E. 43 (S.D. Miss. May 29, 2015) (same); *Case v. Danos & Carole Marine Contractors, L.L.C.*, 2015 WL 1978653 (E.D. La. May 4, 2015).

8. I began working as counsel in the instant matter and I calculate that I have spent 30.1 hours working on this matter to date. See "Time Sheet", attached as Exhibit 1 hereto. Expenses are in the amount of \$734.69. See "Expenses", attached as Exhibit 2.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed this the 16th day of May, 2017.

Jackson, Mississippi



Christopher W. Espy

EXHIBIT "A"